Morris James LLP

Mary B. Matterer
302.888.6960
mmatterer@morrisjames.com

May 8, 2017

VIA EFILING
The Honorable Gregory M. Sleet
United States District Court
for the District of Delaware
844 N. King Street
Wilmington, DE 19801

RE: ICN Acquisition, LLC v. Zonoff, Inc., Case Nos. 14-cv-1199 and 15-cv-1109

Your Honor:

Pursuant to your March 8, 2017 order, I submit the following letter on behalf of my client ICN Acquisition, LLC ("ICN") and Defendant Zonoff, Inc. ("Zonoff") regarding the status of the above-captioned litigations.

As of March 8, 2017, former plaintiff and patent owner Icontrol Networks, Inc. ("Icontrol") was divested of ownership of the patents-in-suit. Icontrol was acquired by Comcast and Alarm.com. Alarm.com, via its wholly-owned subsidiary ICN, purchased certain of Icontrol's assets, including patents and related legal claims, and specifically the patents-in-suit.

Following Icontrol's divestiture, new patent owner, ICN, was substituted as Plaintiff in the above-captioned litigations. ICN is ready to proceed with the case and respectfully requests that the Court enter a schedule.

ICN's position: ICN understands that Zonoff has ceased business operations, but has not yet filed for bankruptcy. Unless Zonoff can represent that it will be filing for bankruptcy within the next month, ICN proposes that the parties negotiate a schedule and the Court set a trial date.

Zonoff's position: Zonoff has ceased business operations and anticipates that its status will be clarified within thirty days. Zonoff proposes that the stay be extended for another forty-five days and that the parties shall provide a further update to the Court no later than that date. ICN opposes this extension.

Respectfully,

/s/ Mary B. Matterer

Mary B. Matterer (I.D. #2696)
mmatterer@morrisjames.com